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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF ARIZONA**
8

9 United States of America,

10 Plaintiff,

11 v.

12 Backpage.com LLC, et al.,

13 Defendants.
14

No. CR-18-00465-PHX-DJH

**PRELIMINARY ORDER OF
FORFEITURE**

15
16 Upon consideration of the Stipulation for Entry of Preliminary Order of Forfeiture
17 (Doc. 21) filed by the plaintiff, United States of America, and the defendants,
18 Backpage.com, LLC, Website Technologies, LLC, Posting Solutions LLC, Amstel River
19 Holdings, LLC, Ad Tech BV, and UGC Tech Group CV (“defendants”), pursuant to the
20 information, each defendant’s guilty plea to said information, and Rule 32.2(b), Federal
21 Rules of Criminal Procedure, and good cause appearing, the Court **ORDERS** as follows:

22 Any and all of each defendant’s rights, title, and interest in and to the following
23 property (the “Forfeited Property”) is hereby forfeited to the United States on the ground
24 that it represents or is traceable to proceeds of the underlying violation of conviction.
25 Consistent with the express agreement of the parties, this Order is final as to each
26 defendant upon entry.

27 **IT IS FURTHER ORDERED** the Forfeited Property includes the following:

28 ...

1 A. U.S. Bank Accounts

- 2 1. Any and all bank funds, securities, or other assets on deposit or seized from
3 account number x7188 held at Prosperity Bank. (The account is held in the
4 name of Posting Solutions LLC and the estimated value is \$3,100,000.)
- 5 2. Any and all bank funds, securities, or other assets on deposit or seized from
6 account number x4155 at JP Morgan Chase that were previously transferred
7 into that account by the bail bonds service of Carl Ferrer. (The estimated
8 value is \$500,000.)
- 9 3. Any and all bitcoin or other assets on deposit or seized from bitcoin wallet
10 address -6Lix5 that were previously transferred into that account from the
11 bitcoin wallet address -CSRd8. (The estimated number of bitcoin is 405.)
- 12 4. Any and all bitcoin or other assets on deposit or seized from bitcoin wallet
13 address -6Lix5 that were previously transferred into that account from the
14 bitcoin wallet address -9aRkE. (The estimated number of bitcoin is 200.)
- 15 5. Any and all bitcoin or other assets on deposit or seized from bitcoin wallet
16 address -6Lix5 that were previously transferred into that account from
17 Coinapault. (The estimated number of bitcoin is 7.)
- 18 6. Any and all bitcoin or other assets on deposit or seized from bitcoin wallet -
19 6Lix5 that were previously transferred into that account from GoCoin.
20 (The estimated number of bitcoin is 412.)
- 21 7. Any and all bitcoin or other assets on deposit or seized from bitcoin wallet
22 address -6Lix5 that were previously transferred into that account from
23 Mobile Currency. (The estimated number of bitcoin is 173.)
- 24 8. Any and all litecoin or other assets on deposit or seized from litecoin wallet
25 address -goaeV that were previously transferred into that wallet from the
26 Nano Ledger S. (The estimated number of litecoin is 16,311.)
- 27 9. Any and all bitcoin cash or other assets on deposit or seized from bitcoin
28 cash wallet address -t8v7e that were previously transferred into that

1 account from the Nano Ledger S. (The estimated amount of bitcoin cash is
2 2,673.)

3 10. Any and all bank funds, securities, or other assets on deposit or seized from
4 account number x4155 at JP Morgan Chase that were previously transferred
5 into that account from an Ad Tech BV account (x2071) held in the
6 Netherlands. (The estimated value is \$106,998.41.)

7 11. Any and all bank funds, securities, or other assets on deposit or seized from
8 account number x4155 at JP Morgan Chase that were previously transferred
9 into that account from a Payment Solutions BV account (x7684) held in the
10 Netherlands. (The estimated value is \$700,000.)

11 12. Any and all bank funds, securities, or other assets on deposit or seized from
12 account number x6886 held at Crypto Capital. (The account is held in the
13 name of Website Technologies and the estimated value is \$52,722.87.)

14 13. Any and all bank funds, securities, or other assets on deposit or seized from
15 account number x1124 held at Crypto Capital. (The account is held in the
16 name of Ad Tech BV and the estimated value is \$41,994.24.)

17 14. Any and all bank funds, securities, or other assets on deposit or seized from
18 account number x1933 held at Crypto Capital. (The account is held in the
19 name of Ad Tech BV and the estimated value is \$129,000.)

20 15. Any and all bank funds, securities, cryptocurrency, or other assets on
21 deposit or seized from an account held at Kraken in the name of Ad Tech
22 BV. (The estimated value is \$236,742.03.)

23 16. Any and all bank funds, securities, or other assets on deposit or seized from
24 account number x4155 at JP Morgan Chase that were previously transferred
25 into that account by Crypto Capital account of Ad Tech BV. (The
26 estimated value is \$50,000.)

27 17. Any and all bank funds, securities, or other assets on deposit or seized from
28 account number x4155 at JP Morgan Chase that were previously transferred

1 into that account by Crypto Capital account of Website Technologies. (The
2 estimated value is \$42,500.)

- 3 18. Any and all bank funds, securities, or other assets on deposit or seized from
4 account number x4155 at JP Morgan Chase that were previously or will be
5 transferred into that account by Paul Hastings LLP on behalf of Website
6 Technologies, LLC. (The estimated value is \$248,970.)

7 B. Foreign Bank Accounts

- 8 1. Any and all bank funds, securities, or other assets on deposit or seized from
9 account number x5803 held at Fio Banka (Czech Republic). (The account
10 is held in the name of Ad Tech BV and the estimated value is \$1,228.76.)
- 11 2. Any and all bank funds, securities, or other assets on deposit or seized from
12 account number x5801 held at Fio Banka (Czech Republic). (The account
13 is held in the name of Ad Tech BV and the estimated value is \$18,610.10.)
- 14 3. Any and all bank funds, securities, or other assets on deposit or seized from
15 account number x5805 held at Fio Banka (Czech Republic). (The account
16 is held in the name of Ad Tech BV and the estimated value is \$3,738.45.)
- 17 4. Any and all bank funds, securities, or other assets on deposit or seized from
18 account number x4198 held at Fio Banka (Czech Republic). (The account
19 is held in the name of Protecctio s.r.o. and the estimated value is
20 \$112,880.49.)
- 21 5. Any and all bank funds, securities, or other assets on deposit or seized from
22 account number x4194 held at Fio Banka (Czech Republic). (The account
23 is held in the name of Protecctio s.r.o. and the estimated value is
24 \$3,803,097.22.)
- 25 6. Any and all bank funds, securities, or other assets on deposit or seized from
26 account number x4196 held at Fio Banka (Czech Republic). (The account
27 is held in the name of Protecctio s.r.o. and the estimated value is
28 \$4,902.90.)

7. Any and all bank funds, securities, or other assets on deposit or seized from account number x2226 held at Fio Banka (Czech Republic). (The account is held in the name of Gold Leaf s.r.o. and the estimated value is \$1,425,902.33.)
8. Any and all bank funds, securities, or other assets on deposit or seized from account number x2231 held at Fio Banka (Czech Republic). (The account is held in the name of Gold Leaf s.r.o. and the estimated value is \$104,062.02.)
9. Any and all bank funds, securities, or other assets on deposit or seized from account number x2230 held at Fio Banka (Czech Republic). (The account is held in the name of Gold Leaf s.r.o. and the estimated value is \$504,972.87.)
10. Any and all bank funds, securities, or other assets on deposit or seized from account number x8083 held at Fio Banka (Czech Republic). (The account is held in the name of Varicok Company s.r.o. and the estimated value is \$440,467.75.)
11. Any and all bank funds, securities, or other assets on deposit or seized from account number x8086 held at Fio Banka (Czech Republic). (The account is held in the name of Varicok Company s.r.o. and the estimated value is \$29,287.55.)
12. Any and all bank funds, securities, or other assets on deposit or seized from account number x8080 held at Fio Banka (Czech Republic). (The account is held in the name of Varicok Company s.r.o. and the estimated value is \$280,692.50.)
13. Any and all bank funds, securities, or other assets on deposit or seized from account number LI090x held at AS LHV Pank (Estonia). (The account is held in the name of Olist O.U. and the estimated value is \$1,725,000.)

14. Any and all bank funds, securities, or other assets on deposit or seized from account number LI090x held at Bank Frick (Liechtenstein). (The account is held in the name of Ad Tech BV and the estimated value is \$8,292.87.)
15. Any and all bank funds, securities, or other assets on deposit or seized from account number LI300x held at Bank Frick (Liechtenstein). (The account is held in the name of Ad Tech BV and the estimated value is \$2,601,164.44.)
16. Any and all bank funds, securities, or other assets on deposit or seized from account number LI740x held at Bank Frick (Liechtenstein). (The account is held in the name of Ad Tech BV and the estimated value is \$1,533,820.07.)
17. Any and all bank funds, securities, or other assets on deposit or seized from account number LI900x held at Bank Frick (Liechtenstein). (The account is held in the name of Ad Tech BV and the estimated value is \$1,598,027.)
18. Any and all bank funds, securities, or other assets on deposit or seized from account number x7664 held at Knab Bank (Netherlands). (The account is held in the name of Procop Services BV and the estimated value is \$2,700,000.)
19. Any and all bank funds, securities, or other assets on deposit or seized from account number x2452 held at Rabo Bank (Netherlands). (The account is held in the name of Guilietta Group BV and the estimated value is \$650,000.)
20. Any and all bank funds, securities, or other assets on deposit or seized from account number x4721 held at Rabo Bank (Netherlands). (The account is held in the name of Guilietta Group BV and the estimated value is \$650,000.)

21. Any and all bank funds, securities, or other assets on deposit or seized from an account at Cashflows Europe Ltd (UK) held in the name of Gulietta Group BV. (The estimated value is \$613,343.07.)
22. Any and all bank funds, securities, or other assets on deposit or seized from an account at Cashflows Europe Ltd (UK) held in the name of Universeads BV. (The estimated value is \$79,304.96.)
23. Any and all bank funds, securities, or other assets on deposit or seized from account at Cashflows Europe Ltd (UK) held in the name of Procop Services BV. (The estimated value is \$146,245.91.)

C. Domain Names

1. admoderation.com (Versio)
2. admoderators.com (Versio)
3. adnet.ws (NetNames)
4. adplace24.com (Versio)
5. adplaces24.com (Versio)
6. adpost24.com (Versio)
7. adpost24.cz (GoDaddy)
8. adquick365.com (Versio)
9. adreputation.com (NetNames)
10. ads-posted-mp.com (Versio)
11. adsplace24.com (Versio)
12. adspot24.com (Versio)
13. adspots24.com (Versio)
14. adsspot24.com (Versio)
15. adtechbv.co.nl (NetNames)
16. adtechbv.com (NetNames)
17. adtechbv.nl (NetNames)
18. advert-ep.com (Versio)

- 1 19. adverts-mp.com (Versio)
- 2 20. axme.com (GoDaddy)
- 3 21. back0age.com (NetNames)
- 4 22. backpa.ge (NetNames)
- 5 23. backpae.com (NetNames)
- 6 24. backpage-insider.com (NetNames)
- 7 25. backpage.adult (NetNames)
- 8 26. backpage.ae (NetNames)
- 9 27. backpage.at (NetNames)
- 10 28. backpage.ax (NetNames)
- 11 29. backpage.be (NetNames)
- 12 30. backpage.bg (European domains)
- 13 31. backpage.bg (NetNames)
- 14 32. backpage.ca (NetNames)
- 15 33. backpage.cl (NetNames)
- 16 34. backpage.cn (European domains)
- 17 35. backpage.cn (NetNames)
- 18 36. backpage.co.id (NetNames)
- 19 37. backpage.co.nl (European domains)
- 20 38. backpage.co.nl (NetNames)
- 21 39. backpage.co.nz (NetNames)
- 22 40. backpage.co.uk (NetNames)
- 23 41. backpage.co.ve (NetNames)
- 24 42. backpage.co.za (NetNames)
- 25 43. backpage.com (NetNames)
- 26 44. backpage.com.ar (NetNames)
- 27 45. backpage.com.au (NetNames)
- 28 46. backpage.com.ph (NetNames)

- 1 47. backpage.cz (NetNames)
- 2 48. backpage.dk (NetNames)
- 3 49. backpage.ec (NetNames)
- 4 50. backpage.ee (European domains)
- 5 51. backpage.ee (NetNames)
- 6 52. backpage.es (NetNames)
- 7 53. backpage.fi (European domains)
- 8 54. backpage.fi (NetNames)
- 9 55. backpage.fr (European domains)
- 10 56. backpage.fr (NetNames)
- 11 57. backpage.gr (European domains)
- 12 58. backpage.gr (NetNames)
- 13 59. backpage.hk (European domains)
- 14 60. backpage.hk (NetNames)
- 15 61. backpage.hu (European domains)
- 16 62. backpage.hu (NetNames)
- 17 63. backpage.ie (NetNames)
- 18 64. backpage.in (NetNames)
- 19 65. backpage.it (NetNames)
- 20 66. backpage.jp (NetNames)
- 21 67. backpage.kr (NetNames)
- 22 68. backpage.lt (NetNames)
- 23 69. backpage.lv (European domains)
- 24 70. backpage.lv (NetNames)
- 25 71. backpage.me (NetNames)
- 26 72. backpage.mx (NetNames)
- 27 73. backpage.my (NetNames)
- 28 74. backpage.net (NetNames)

- 1 75. backpage.nl (NetNames)
- 2 76. backpage.no (European domains)
- 3 77. backpage.no (NetNames)
- 4 78. backpage.nz (NetNames)
- 5 79. backpage.pe (NetNames)
- 6 80. backpage.ph (NetNames)
- 7 81. backpage.pk (NetNames)
- 8 82. backpage.pl (NetNames)
- 9 83. backpage.porn (NetNames)
- 10 84. backpage.pt (NetNames)
- 11 85. backpage.ro (European domains)
- 12 86. backpage.ro (NetNames)
- 13 87. backpage.se (NetNames)
- 14 88. backpage.sex (NetNames)
- 15 89. backpage.sg (NetNames)
- 16 90. backpage.si (European domains)
- 17 91. backpage.si (NetNames)
- 18 92. backpage.sk (European domains)
- 19 93. backpage.sk (NetNames)
- 20 94. backpage.sucks (NetNames)
- 21 95. backpage.tw (NetNames)
- 22 96. backpage.uk (NetNames)
- 23 97. backpage.uk.com (NetNames)
- 24 98. backpage.us (NetNames)
- 25 99. backpage.vn (NetNames)
- 26 100. backpage.xxx (NetNames)
- 27 101. backpage.xyz (NetNames)
- 28 102. backpagecompimp.com (NetNames)

- 1 103. backpagecompimps.com (NetNames)
- 2 104. backpagepimp.com (NetNames)
- 3 105. backpagepimps.com (NetNames)
- 4 106. backpageg.com (NetNames)
- 5 107. backpagegm.com (NetNames)
- 6 108. backpageu.com (NetNames)
- 7 109. backpaoe.com (NetNames)
- 8 110. backpawe.com (NetNames)
- 9 111. backqage.com (NetNames)
- 10 112. backrage.com (NetNames)
- 11 113. backxage.com (NetNames)
- 12 114. bakkpage.com (NetNames)
- 13 115. bcklistings.com (NetNames)
- 14 116. bestofbackpage.com (NetNames)
- 15 117. bestofbigcity.com (NetNames)
- 16 118. bickpage.com (NetNames)
- 17 119. bigcity.com (NetNames)
- 18 120. bpclassified.com (NetNames)
- 19 121. bpclassifieds.com (NetNames)
- 20 122. carlferrer.com (NetNames)
- 21 123. clasificadosymas.com (NetNames)
- 22 124. clasificadosymas.net (NetNames)
- 23 125. clasificadosymas.org (NetNames)
- 24 126. classifiedsolutions.co.uk (NetNames)
- 25 127. classifiedsolutions.net (NetNames)
- 26 128. classyadultads.com (Versio)
- 27 129. columbusbackpage.com (NetNames)
- 28 130. connecticutbackpage.com (NetNames)

- 1 131. cracker.co.id (NetNames)
- 2 132. cracker.com (NetNames)
- 3 133. cracker.com.au (NetNames)
- 4 134. cracker.id (NetNames)
- 5 135. cracker.net.au (NetNames)
- 6 136. crackers.com.au (NetNames)
- 7 137. crackers.net.au (NetNames)
- 8 138. ctbackpage.com (NetNames)
- 9 139. dallasbackpage.com (NetNames)
- 10 140. denverbackpage.com (NetNames)
- 11 141. easypost123.com (Versio)
- 12 142. easyposts123.com (Versio)
- 13 143. emais.com.pt (NetNames)
- 14 144. evilempire.com (NetNames)
- 15 145. ezpost123.com (Versio)
- 16 146. fackpage.com (NetNames)
- 17 147. fastadboard.com (Versio)
- 18 148. guliettagroup.nl (Versio)
- 19 149. http.org (NetNames)
- 20 150. ichold.com (NetNames)
- 21 151. internetspeechfoundation.com (nameisp)
- 22 152. internetspeechfoundation.org (nameisp)
- 23 153. loads2drive.com (NetNames)
- 24 154. loadstodrive.com (NetNames)
- 25 155. loadtodrive.com (NetNames)
- 26 156. losangelesbackpage.com (NetNames)
- 27 157. mediafilecloud.com (NetNames)
- 28 158. miamibackpage.com (NetNames)

- 1 159. minneapolisbackpage.com (NetNames)
- 2 160. mobileposting.com (Versio)
- 3 161. mobilepostings.com (Versio)
- 4 162. mobilepostlist.com (Versio)
- 5 163. mobilposting.com (Versio)
- 6 164. naked.city (NetNames)
- 7 165. nakedcity.com (NetNames)
- 8 166. newyorkbackpage.com (NetNames)
- 9 167. paidbyhour.com (NetNames)
- 10 168. petseekr.com (NetNames)
- 11 169. petsfindr.com (NetNames)
- 12 170. phoenixbackpage.com (NetNames)
- 13 171. posteasy123.com (Versio)
- 14 172. postfaster.com (NetNames)
- 15 173. postfastly.com (NetNames)
- 16 174. postfastr.com (NetNames)
- 17 175. postonlinewith.com (Versio)
- 18 176. postonlinewith.me (Versio)
- 19 177. postseasy123.com (Versio)
- 20 178. postsol.com (GoDaddy)
- 21 179. postszone24.com (Versio)
- 22 180. postzone24.com (Versio)
- 23 181. postzones24.com (Versio)
- 24 182. rentseekr.com (NetNames)
- 25 183. results911.com (NetNames)
- 26 184. sandiegobackpage.com (NetNames)
- 27 185. sanfranciscobackpage.com (NetNames)
- 28 186. seattlebackpage.com (NetNames)

- 1 187. sellyostuffonline.com (Versio)
- 2 188. sfbackpage.com (NetNames)
- 3 189. simplepost24.com (Versio)
- 4 190. simpleposts24.com (Versio)
- 5 191. svc.ws (NetNames)
- 6 192. truckrjobs.com (NetNames)
- 7 193. ugctechgroup.com (NetNames)
- 8 194. universads.nl (Versio)
- 9 195. villagevoicepimps.com (GoDaddy)
- 10 196. websitetechnologies.co.uk (NetNames)
- 11 197. websitetechnologies.com (NetNames)
- 12 198. websitetechnologies.net (NetNames)
- 13 199. websitetechnologies.nl (NetNames)
- 14 200. websitetechnologies.org (NetNames)
- 15 201. weprocessmoney.com (GoDaddy)
- 16 202. wst.ws (NetNames)
- 17 203. xn--yms-fla.com (NetNames)
- 18 204. ymas.ar.com (European domains)
- 19 205. ymas.br.com (European domains)
- 20 206. ymas.br.com (NetNames)
- 21 207. ymas.bz (European domains)
- 22 208. ymas.bz (NetNames)
- 23 209. ymas.cl (European domains)
- 24 210. ymas.cl (NetNames)
- 25 211. ymas.co.bz (European domains)
- 26 212. ymas.co.bz (NetNames)
- 27 213. ymas.co.cr (European domains)
- 28 214. ymas.co.cr (NetNames)

- 1 215. ymas.co.ni (European domains)
- 2 216. ymas.co.ni (NetNames)
- 3 217. ymas.co.ve (European domains)
- 4 218. ymas.co.ve (NetNames)
- 5 219. ymas.com (NetNames)
- 6 220. ymas.com.br (European domains)
- 7 221. ymas.com.br (NetNames)
- 8 222. ymas.com.bz (European domains)
- 9 223. ymas.com.bz (NetNames)
- 10 224. ymas.com.co (European domains)
- 11 225. ymas.com.co (NetNames)
- 12 226. ymas.com.do (European domains)
- 13 227. ymas.com.do (NetNames)
- 14 228. ymas.com.ec (European domains)
- 15 229. ymas.com.ec (NetNames)
- 16 230. ymas.com.es (European domains)
- 17 231. ymas.com.es (NetNames)
- 18 232. ymas.com.gt (European domains)
- 19 233. ymas.com.gt (NetNames)
- 20 234. ymas.com.hn (European domains)
- 21 235. ymas.com.hn (NetNames)
- 22 236. ymas.com.mx (NetNames)
- 23 237. ymas.com.ni (European domains)
- 24 238. ymas.com.ni (NetNames)
- 25 239. ymas.com.pe (European domains)
- 26 240. ymas.com.pe (NetNames)
- 27 241. ymas.com.pr (European domains)
- 28 242. ymas.com.pr (NetNames)

- 1 243. ymas.com.pt (NetNames)
- 2 244. ymas.com.uy (European domains)
- 3 245. ymas.com.uy (NetNames)
- 4 246. ymas.com.ve (European domains)
- 5 247. ymas.com.ve (NetNames)
- 6 248. ymas.cr (European domains)
- 7 249. ymas.cr (NetNames)
- 8 250. ymas.do (European domains)
- 9 251. ymas.do (NetNames)
- 10 252. ymas.ec (European domains)
- 11 253. ymas.ec (NetNames)
- 12 254. ymas.es (European domains)
- 13 255. ymas.es (NetNames)
- 14 256. ymas.org (NetNames)
- 15 257. ymas.pe (European domains)
- 16 258. ymas.pe (NetNames)
- 17 259. ymas.pt (NetNames)
- 18 260. ymas.us (European domains)
- 19 261. ymas.us (NetNames)
- 20 262. ymas.uy (European domains)
- 21 263. ymas.uy (NetNames)
- 22 264. ymas.uy.com (European domains)

23 D. Security Deposits And Retainers/Deposits For Future Services

- 24 1. Deposit/retainer to DesertNet. (The estimated value is \$600,000.)
- 25 2. Deposit/retainer to Salesforce Data Storage & Services. (The estimated
- 26 value is \$113,458.)
- 27 3. Deposit/retainer to Sophos EndPoint. (The estimated value is \$14,225.)
- 28 4. Deposit/retainer to SHI VMWare. (The estimated value is \$180,417.)

5. Deposit/retainer to Salesforce Data Storage & Services. (The estimated value is \$113,458.)
6. Deposit/retainer to SHI. (The estimated value is \$57,971.)
7. Prepaid rent to Spaces. (The estimated value is \$97,607.)
8. Security deposit to Spaces. (The estimated value is \$40,945.)
9. Deposit/retainer to Switch Data Center. (The estimated value is \$85,933.05.)
10. Any and all bank funds, securities, or other assets remaining in IOLTA account number x6180 at First Republic Bank at the conclusion of litigation in this case (with the understanding that the funds currently on deposit in that account may be withdrawn by counsel solely for the provision of legal services).
11. Any and all bank funds, securities, or other assets remaining in IOLTA account number x6255 at First Republic Bank at the conclusion of litigation in this case (with the understanding that the funds currently on deposit in that account may be withdrawn by counsel solely for the provision of legal services).
12. Any and all bank funds, securities, or other assets remaining in IOLTA account number x5978 at First Republic Bank at the conclusion of litigation in this case (with the understanding that the funds currently on deposit in that account may be withdrawn by counsel solely for the provision of legal services).
13. Any and all bank funds, securities, or other assets previously deposited into IOLTA account number x7091 at Wells Fargo to fund the criminal defense of Backpage.com, LLC, Website Technologies, LLC, Posting Solutions LLC, Amstel River Holdings LLC, Ad Tech BV, and/or UGC Tech Group BV that are remaining in the account at the conclusion of litigation in this case (with the understanding that the funds currently on deposit in that

account may be withdrawn by counsel solely for the provision of legal services).

E. Reserves and Accounts Receivable—Foreign

1. Any and all bank funds, securities, or other assets on deposit at Bank Frick & Co. Ag, Landstrasse 14, 9496 Balzers, Liechtenstein for the following companies: (a) Ad Tech BV, dba Cracker.com (estimated to be at least \$1,439,203.51).
2. Any and all bank funds, securities, or other assets on deposit at Borgun, Armuli 30, 108 Reykjavik, Iceland for the following companies: (a) Protecctio SRO, dba AdPost24.com (estimated to be at least \$157,899.51); and (b) Goldleaf SRO, dba Fastadboard.com (estimated to be at least \$341,768.81).
3. Any and all bank funds, securities, or other assets on deposit at Cpc1 (Cashflows), Capital Park, Cambridge, CB21 5XE, United Kingdom for the following companies: (a) Protecctio SRO, dba AdPost24.com (estimated to be at least \$94,656.37); (b) Gulietta Group BV, dba Mobileposting.com (estimated to be at least \$15,043.12); (c) Universads BV, dba Easypost123.com (estimated to be at least \$332,595.37); (d) Procop Services BV, dba Postzone24.Com (estimated to be at least \$205,508.33); and (e) Procop Services BV, dba Postix.com (estimated to be at least \$225,454.43).
4. Any and all bank funds, securities, or other assets on deposit at Cpc1 (Cashflows), Capital Park, Cambridge, CB21 5XE, United Kingdom for Amex for the following companies: (a) Gulietta Group BV, dba mobileposting.com (estimated to be at least \$1,042,803.72); (b) Universads BV, dba easypost123.com (estimated to be at least \$221,211.47); (c) Procop Services BV, dba Postzone24.com (estimated to be at least

\$6,897.66); and (d) Procop Services BV, dba Postix.Com (estimated to be at least \$28,738.20).

5. Any and all bank funds, securities, or other assets on deposit at E-Comprocessing, 14 Tonbridge Chambers Pembury Road Tonbridge Kent TN9 2HZ United Kingdom for the following companies: (a) Gulletta Group BV, dba Mobileposting.com (estimated to be at least \$661,276.95); (b) Universads BV, dba easypost123.com (estimated to be at least \$952,506.56); (c) Protecctio SRO, dba adpost24.com (estimated to be at least \$1,383,949.27); (d) Goldleaf SRO, dba fastadboard.com (estimated to be at least \$757,816.01); (e) Varicok SRO, dba postfree.com (estimated to be at least \$278,652.63); (f) Procop Services BV, dba postzone24.com (estimated to be at least \$142,114.96); and (g) Olist OU, dba jeboom.com (estimated to be at least \$1,238,115.92).

6. Any and all bank funds, securities, or other assets on deposit at Emerchantpay LTD, 29 Howard Street, North Shields, Tyne And Wear, NE30 1AR, United Kingdom for the Neosurf card for the following companies: (a) Protecctio SRO, dba adpost24.com (estimated to be at least \$136,792.29); (b) Goldleaf SRO, dba fastadboard.com (estimated to be at least \$248.27); (c) Varicok SRO, dba postfree.com (estimated to be at least \$86,076.89); and (d) Olist OU, dba jeboom.com (estimated to be at least \$509.21).

7. Any and all bank funds, securities, or other assets on deposit at Kalixa, The Corn Mill, 1 Roydon Road, Stanstead Abbots, Ware, Hertfordshire; SG12 BXL, United Kingdom for the following companies: (a) Gulletta Group BV, dba Mobileposting.com (estimated to be at least \$342,522.89); (b) Universads BV, dba Easypost123.com (estimated to be at least \$546,714.23); (c) Procop Services BV, dba Postzone24.com (estimated to

be at least \$94,134.65); and (d) Procop Services BV, dba Postix.com (estimated to be at least \$141,617.92).

8. Any and all bank funds, securities, or other assets on deposit at Korta Bank Rafstöðvarvegi 7 | 110 Reykjavík, Iceland for the following companies: (a) Protecctio SRO, dba Adpost24.com (estimated to be at least \$1,783,607.59); (b) Universads BV, dba Easypost123.com (estimated to be at least \$178,011.10); (c) Goldleaf SRO, dba FASADBoard.com (estimated to be at least \$2,128,385.54); (d) Varicok SRO, dba Postfree.com (estimated to be at least \$448,593.62); (e) Procop Services BV, dba Postix.com (estimated to be at least \$133,611.63); (f) Olist OU, dba Jeboom.com (estimated to be at least \$675,552.56).

9. Any and all bank funds, securities, or other assets on deposit at Kvika Bank, Borgartún 25, 6th Floor, 105 Reykjavík, Iceland for the following companies: (a) Gulietta Group BV, dba mobileposting.com (estimated to be at least \$116,880.00).

10. Any and all bank funds, securities, or other assets on deposit at Masa Pay, 19f Hangke Building No.92 Yuan Shen Rd. Pudong, Shanghai 200120 China for the following companies: (a) Goldleaf SRO, dba fastadboard.com (estimated to be at least \$87,799.92).

11. Any and all bank funds, securities, or other assets on deposit at Poli Payments Pty Limited, Level 8. 222 Exhibition Street, Melbourne, Victoria, 3000 for the following companies: (a) Ad Tech BV, dba Cracker.com (estimated to be at least \$471,960.05).

12. Any and all bank funds, securities, or other assets on deposit at Transact Europe, 52-54 Dimitar Hadzhikotsev Str., 1421 Sofia, Bulgaria for the following companies: (a) Protecctio SRO, dba adpost24.com (estimated to be at least \$720,254.57); (b) Goldleaf SRO, dba fastadboard.com

(estimated to be at least \$1,375,661.62); and (c) Procop Services BV, dba postix.com (estimated to be at least \$130,962.90).

13. Any and all bank funds, securities, or other assets on deposit at Worldline SA/NV, Haachtsesteenweg 1442, 1130 Brussels, Belgium for the following companies: (a) Protecctio SRO, dba adpost24.com (estimated to be at least \$767,421.64); and (b) Procop Services BV, dba postix.com (estimated to be at least \$121,701.67).

14. Any and all bank funds, securities, or other assets on deposit at DCR Strategies INC., 2680 Skymark Ave. Suite 420 Mississauga, ON, L4W 5L6 for the following companies: (a) Posting Solutions LLC, dba Postfastr.com (estimated to be at least \$503,425.14).

15. Any and all bank funds, securities, or other assets on deposit at Ecorepay, aka BillPro Pty Ltd, Operations Level 5 / 12 Commercial Road, Newstead, Queensland 4006 Australia for the following companies: (a) Classified Strategies Cooperatief U.A., dba Backpage.com and cracker.com (estimated to be at least \$846,414.00).

16. Any and all bank funds, securities, or other assets on deposit at Ipaydna International Limited, Level 12, 1 Peking Road, Tsim Sha Tsui, Kowloon, Hong Kong or Ipaydna (EU) Limited, Suite B, 29 Harley Street, London, W1G9QR, United Kingdom, for the following companies: (a) Classified Solutions Ltd., dba Backpage.com (estimated to be at least \$809,492.29).

F. Reserves and Accounts Receivable—Domestic

1. Any and all bank funds, securities, or other assets on deposit at Paymitco, 4700 Millenia Blvd. Suite 175, Orlando, Florida 32839 for the following companies: (a) Posting Solutions LLC, dba backpage.com (estimated to be at least \$647,410.05).

2. Any and all bank funds, securities, or other assets on deposit at Romit, 25 Taylor St., San Francisco, CA 94123 for the following companies: (a)

Website Technologies LLC, dba backpage.com (estimated to be at least \$600,777.43).

3. Any and all bank funds, securities, or other assets on deposit at Cardquiry With Posting Solutions LLC, 2209 E. Lexington Ave, Fresno, CA 93720 for the following companies: (a) Posting Solutions LLC, dba backpage.com (estimated to be at least \$275,381.95).

4. Any and all bank funds, securities, or other assets on deposit at Business & Corporate Development, LLC, A South Carolina Limited Liability (“Bcd”) for the following companies: (a) Protecctio SRO, dba adpost24.com (estimated to be at least \$396.59); (b) Gulietta Group BV, dba mobileposting.com (estimated to be at least \$33,416.02); (c) Universads BV, dba easypost123.com (estimated to be at least \$15,942.60); (d) Goldleaf SRO, dba fastadboard.com (estimated to be at least \$11,793.50); (e) Varicok SRO, dba postfree.com (estimated to be at least \$5,191.95); (f) Procop Services BV, dba postix.com (estimated to be at least \$1,379.57); (g) Procop Services BV, dba postzone24.com (estimated to be at least \$1,084.12); (h) Olist OU, dba jeboom.com (estimated to be at least \$5,637.20); and (i) Posting Solutions LLC, dba backpage.com (estimated to be at least \$328,667.76).

G. Trademarks And Other Intellectual Property

1. Backpage (United States, Australia, Canada, Europe).
2. Cracker (Australia).
3. All social media accounts affiliated with Backpage.com (e.g., Twitter account)

IT IS FURTHER ORDERED as follows:

A. Upon the entry of this Order, and pursuant to 21 U.S.C. § 853 and Fed. R. Crim. P. 32.2(b)(3), the United States Attorney General (or his designee, the United

1 States Marshals Service (“USMS”)) shall seize the Forfeited Property, subject to the
2 following limitations:

3 (1) With respect to accounts 10-13 listed in Section D, the accounts
4 shall not be seized at this time. Rather, the funds currently on deposit in accounts 10-13
5 shall remain under the control of counsel and may be withdrawn by counsel in such
6 amounts as may be necessary to defray the cost of any legal services provided in
7 connection with the instant case or any related civil or criminal proceeding. At the
8 conclusion of all litigation in connection with the instant case or any related civil or
9 criminal proceeding, counsel shall submit an accounting of all withdrawals made from
10 accounts 10-13 to the Attorney General (or his designee) and a schedule of the balances
11 remaining in the respective accounts. At that time, the United States or the Attorney
12 General (or his designee) may move pursuant to Rule 32.2(e) to amend this Order to
13 specify the amounts in each of the accounts that are subject to forfeiture. At the end of
14 litigation, instead of seizing the remaining balance in each of the respective accounts
15 once the Order of Forfeiture is amended, the Attorney General (or his designee) shall
16 direct counsel to transfer the remaining balance in each account to an account designated
17 by the Attorney General (or his designee), which transfer will be made by certified check
18 or wire transfer, at the sole election of the Attorney General (or his designee), at a time of
19 the Attorney General’s (or his designee’s) choosing.

20 B. Upon entry of this Order, the United States is authorized to conduct any
21 discovery for the purpose of identifying, locating, or disposing of the Forfeited Property
22 pursuant to this Order, 21 U.S.C. § 853(m), and Rule 32.2(b)(3) of the Federal Rules of
23 Criminal Procedure. “Any discovery” shall include all methods of discovery permitted
24 under the Federal Rules of Civil Procedure.

25 C. The United States Attorney General (or his designee) shall commence any
26 appropriate ancillary proceeding to comply with statutes governing third party rights,
27 including giving notice of this and any other order affecting the Forfeited Property. The
28 following paragraphs shall apply to any ancillary proceeding conducted in this matter:

(1) Pursuant to 21 U.S.C. § 853(n)(1) and Supplemental Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the government shall publish, for at least thirty (30) consecutive days on an official government website, notice of this Order and any other order affecting the Forfeited Property, and notice that any person, other than each defendant, having or claiming a legal interest in the property must file a petition with the Court within thirty (30) days of the publication of notice or receipt of actual notice, whichever is earlier. The United States shall also, to the extent practicable, provide written notice to any person known to have an alleged interest in the Forfeitable Property that any such person is required to file a petition within thirty (30) days of the giving of such direct notice.

(2) Other than each defendant, any person asserting a legal interest in the Forfeited Property may, within thirty (30) days of the publication of notice or receipt of notice, whichever is earlier, petition the Court for a hearing without a jury to adjudicate the validity of his alleged interest in the property, and for an amendment of this order of forfeiture, pursuant to 21 U.S.C. § 853(n)(2).

(3) Any petition filed by a third party asserting an interest in the Forfeited Property shall be signed by the petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's purported right, title, or interest in such property, the time and circumstances of the petitioner's acquisition of the right, title, or interest in the property, any additional facts supporting the petitioner's claim, and the relief sought. *See* 21 U.S.C. § 853(n)(3).


(4) The United States shall have clear title to the Forfeited Property following the Court's disposition of all third-party interests or, if no petitions are filed, following the expiration of the period provided in 21 U.S.C. § 853(n)(2) for the filing of third party petitions.

D. Pursuant to Fed. R. Crim. P. 32.2(b)(3) and the agreement of the government and each defendant, this Preliminary Order of Forfeiture shall be final as to each defendant upon entry and shall be made part of its sentence and included in his

1 judgment. Further, if no timely third party ancillary claims are filed after the
2 government's giving notice as ordered herein, all right, title, and interest in the Forfeited
3 Property shall vest in the government, which shall dispose of the property in accordance
4 with law.

5 E. The Court shall retain jurisdiction to enforce this Order, and to amend it as
6 necessary, pursuant to Fed. R. Crim. P. 32.2(e).

7 Dated this 16th day of May, 2018.

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11 Honorable Diane J. Humetewa
United States District Judge
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